

Brett Foster (#6089)
Mark A. Miller (#9563)
Tamara Kapaloski (#13471)
DORSEY & WHITNEY LLP
111 S. Main Street, Suite 2100
Salt Lake City, UT 84111
Telephone: (801) 933-7360
Facsimile: (801) 933-7373
foster.brett@dorsey.com
miller.mark@dorsey.com
kapaloski.tammy@dorsey.com

Attorneys for Plaintiff Blendtec Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

BLENDTEC INC., a Utah corporation,
Plaintiff,

vs.

BLENDJET INC., a Delaware corporation,
MAVORCO HOLDINGS, LLC, a
Delaware limited liability company,
MAVORCO IP, LLC, a Delaware limited
liability company, and
MAVORCO OPERATIONS, LLC, a
Delaware limited liability company,

Defendants.

**BLENDTEC'S REQUEST TO SUBMIT
RELATED TO ITS MOTION FOR
LEAVE TO FILE UNDER SEAL
BLENDTEC'S SUPPLEMENTAL
BRIEF AND SELECT EXHIBITS**

Civil No. 2:25-cv-00096-RJS-DBP
Judge Robert J. Shelby
Magistrate Judge Dustin B. Pead

Pursuant to Local Rule 5-3(b)(2), Plaintiff Blendtec Inc. ("Plaintiff" or "Blendtec") hereby requests that the Court enter the proposed order unsealing the unredacted versions of Blendtec's Supplemental Brief and Exhibits 1-62, 64, 67-74, and 76-81 (filed as Dkt. Nos. 72 and 72-1 through 72-77). In support of this Request, Blendtec states as follows:

Blendtec filed its Motion to Seal the identified documents (filed as Dkt. No. 71) solely

because Blendjet designated the documents as “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to the Standard Protective Order governing the 2021 Action.

As the Court noted in its recent Order, pursuant to DUCivR 5-3(b)(2)(C)(i), Blendjet was required to file a motion to maintain the documents under seal within seven (7) days of service of Blendtec’s Motion. *See* Dkt. No. 73. The seven-day deadline has passed and a motion to maintain the documents under seal has not been filed. As such, the Court should order the documents to be unsealed. This will ease or eliminate the administrative burden on the parties and the Court to seal documents and comply with the other requirements pertaining to Blendjet’s AEO documents, such as excluding people from Court proceedings if they are not qualified recipients.

DATED this 1st day of July, 2025.

DORSEY & WHITNEY LLP

/s/ Tamara L. Kapaloski
Brett Foster (#6089)
Mark A. Miller (#9563)
Tamara L. Kapaloski (#13471)
Attorneys for Plaintiff Blendtec Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July, 2025, I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will send electronic notification to counsel of record.

/s/ Tamara L. Kapaloski